



**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 74192**

Arizona Flexible Packaging, Inc.

I. INTRODUCTION

This Class II Synthetic Minor Air Permit is issued to Arizona Flexible Packaging, Inc., the Permittee, for the continued operation of the flexographic printing facility. The facility is located at 2214 College Drive, Lake Havasu City, Mohave County, Arizona. This permit renews and supersedes Permit No. 59037.

A. Company Information

1. Facility Name: Arizona Flexible Packaging, Inc.
2. Facility Location: 2214 College Drive, Lake Havasu City, AZ 86403
3. Mailing Address: 2214 College Drive, Lake Havasu City, AZ 86403

B. Attainment Classification

The Lake Havasu City area is attainment for all criteria pollutants.

II. PROCESS DESCRIPTION

Arizona Flexible Packaging, Inc. is a flexographic printing facility. The operation consists of a mounting machine, laminator, printing press, slitter, zipper machine, and pouch machine. The plates are mounted onto the sleeved and the printing press applies ink to the plastic rolls. If lamination is required for the product, the laminator seals the ink between two layers of plastic. Then the rolls are cut down to desired size using the slitter. If zippers are required, then they will be applied using the zipper machine. If a pouch is required, the pouch machine will be used to create a standup pouch. The printing process uses solvents and inks, which contain volatile organic compounds (VOC) and hazardous air pollutants (HAPs). The printing press is powered through the combustion of natural gas. This combustion produces a small amount of VOC, nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and particulate matter with an aerodynamic diameter less than 10 microns (PM₁₀) emissions. The Laminator is powered through the combustion of natural gas. This combustion produces a small amount of VOC, NO_x, CO, SO₂, and PM₁₀ emissions.

III. LEARNING SITES EVALUATION

In accordance with ADEQ's Environmental Permits and Approvals Near Learning Sites Policy, the Department conducted an evaluation to determine if any nearby learning sites would be adversely impacted by the facility. Learning sites consist of all existing public schools, charter schools and private schools the K-12 level, and all planned sites for schools approved by the Arizona School Facilities Board. The learning sites policy was established to ensure that the protection of children at learning sites is considered before a permit approval is issued by ADEQ.

Upon review of ADEQ's database, it was determined that there are no learning sites within two miles of the facility.

IV. EMISSIONS

The facility has the potential to emit (PTE) VOC in excess of the major source threshold of 100 tons per year (tpy). In order to maintain a synthetic minor source of VOC, this permit specifies a facility wide VOC emissions cap of 90 tons per year (tpy) on a rolling twelve month basis. Table-1 below provides the summary of emissions from various sources as well as facility wide PTE

Table 1: Potential Emissions

Pollutant	Emissions (tons per year)
PM	0.80
PM₁₀	0.80
PM_{2.5}	0.00
NO_x	1.046
CO	0.875
SO₂	0.006
VOC*	90
HAPs* (Combined/Single)	22.5/9

*The Permittee agreed to the following rolling twelve-month limits: 90 tpy of VOC, 9 tpy of any individual HAP, and 22.5 tpy of total HAPs

V. MINOR NEW SOURCE REVIEW

This renewal permit does not involve any changes to the facility's PTE. As a result, this renewal permit does not trigger minor NSR.

VI. APPLICABLE REGULATIONS

Table 2 displays the applicable requirements for each permitted piece of equipment along with an explanation of why the requirement is applicable.

Table 2: Verification of Applicable Regulations

Unit	Control Device	Rule	Discussion
Printing Press #1 & #2	N/A	A.A.C. R18-2-702.B-C A.A.C. R18-2-730.A,B,D,F and G 40 CFR Part 63, Subpart KK	The printing presses are existing, stationary, point sources. The printing presses are unclassified existing sources. These standards are applicable to the printing and publishing industry. The facility has taken limits to remain an area source of HAPs, and as such only 63.820(a)(2) and 63.829(d) from the Subpart are applicable.
Laminator	N/A	A.A.C. R18-2-702.B-C A.A.C. R18-2-730.A,B,D,F and G	The laminator is an existing, stationary, point source. The laminator is an unclassified existing source.
Fugitive dust sources	Water Trucks Dust Suppressants	A.A.C. R18-2 Article 6 A.A.C. R18-2-702	These standards are applicable to all fugitive dust sources at the facility.
Abrasive Blasting	Wet blasting; Dust collecting equipment; Other approved methods	A.A.C. R-18-2-702 A.A.C. R-18-2-726	These standards are applicable to any abrasive blasting operation.
Spray Painting	Enclosures	A.A.C. R18-2-702 A.A.C. R-18-2-727	This standard is applicable to any spray painting operation.
Demolition/renovation operations	N/A	A.A.C. R18-2-1101.A.8	This standard is applicable to any asbestos related demolition or renovation operations.

VII. PREVIOUS PERMIT CONDITIONS

Permit No. 59037 was issued on May 5, 2014, for the continued operation of this facility. Table 3 below illustrates if a section in Permit No. 59037 was revised or deleted.

Table 3: Permit No. 59037

Section No.	Determination		Comments
	Revised	Delete	
Att. A.	X		General Provisions - Revised to represent most recent template language.
Att. A.VII.A	X		Compliance Certification – Will be submitted annually no later than February 15 th . The report will be for the compliance status of the source for the period of January 1st and December 31 st of the previous year.
Att. B.I	X		Facility-Wide Requirements. Revised to represent most recent template language
Att. B.II	X		Revised formatting
Att. B.III		X	Mobile Source Requirements – Deleted since Mobile Source Emissions are not big concern for source.
Att. B.III	X		Fugitive Dust Requirements – Added in place of Mobile Source Requirements
Att. B.IV	X		Other Periodic Activities - Revised to represent most recent template language

VIII. MONITORING REQUIREMENTS

A. Facility Wide

1. The Permittee will conduct quarterly instantaneous surveys of visible emissions from process stack sources and fugitive dust sources.
2. Along with the annual compliance certification, the Permittee is required to submit reports of all recordkeeping, monitoring and maintenance required by the permit.
3. The Permittee is required to maintain, on-site, records of the manufacturer's specifications or an Operation and Maintenance Plan for all equipment listed in the permit.

B. Laminator/Printing Press

1. The Permittee is required to maintain records of all purchase orders and invoices associated with the purchasing and procurement of all inks, solvents, adhesives and all other VOC containing materials used in the flexographic operation.
2. The Permittee is required to maintain records of the Safety Data Sheets (SDS) for all inks, solvents and adhesives, as well as all other VOC containing materials consumed in the flexographic operation.
3. The Permittee is required to maintain monthly records of the subtotals of the daily quantities of inks, solvents, adhesives, and all other VOC containing materials that

are purchased each day along with their corresponding VOC content.

4. The Permittee is required to calculate and record a monthly subtotal (in tons per month) and 12-month rolling total (in tons per year) of VOC emissions at the end of every month.
5. The Permittee is required to keep a monthly record of the mass (in tons) of all HAP containing materials used; and the SDS showing the mass fraction of HAP present.
6. The Permittee is required to calculate and record a monthly subtotal (in tons per month) and 12-month rolling total (in tons per year) of HAP emissions at the end of every month.

C. Fugitive Dust

1. The Permittee is required to keep record of the dates and types of dust control measures employed.
2. The Permittee is required to show compliance with the opacity standards by having a Method 9 certified observer perform a quarterly survey of visible emission from fugitive dust sources. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.
3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

D. Periodic Activities

1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
2. The Permittee is required to record the date, duration, quantity of paint used, any applicable SDS, and pollution control measures of any spray painting project.
3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

IX. COMPLIANCE HISTORY

The facility has undergone three onsite inspections during the prior permit term and no violations were noted. In addition, this facility has submitted ten semi-annual compliance certifications for review by ADEQ. No deficiencies were noted in these reports.

X. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
HAP	Hazardous Air Pollutant
NO _x	Nitrogen Oxide
PM	Particulate Matter
PM ₁₀	Particulate Matter Nominally less than 10 Micrometers
PTE	Potential-to-Emit
SDS	Safety Data Sheet
SO ₂	Sulfur Dioxide
TPY	Tons per Year
VOC	Volatile Organic Compound
yr	Year

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